

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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RUTHBEY PEREZ,

Plaintiff,

-against-

FRONTIER AIRLINES,

Defendant.

**NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

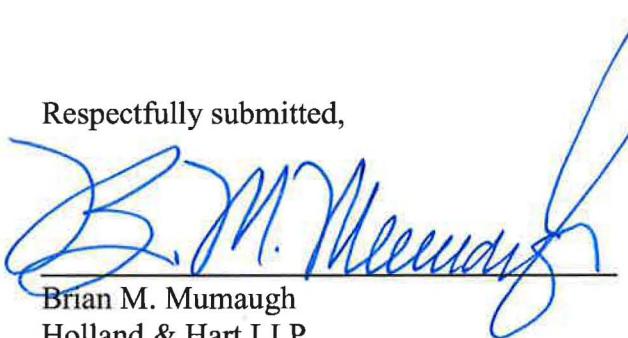
14 CV 5211 (BMC) (LB)

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TO: Ruthbey Perez, Pro Se
41-46 50th Street, Apt. 2B
Woodside, NY 11377

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificates of Good Standing annexed thereto we will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of Holland & Hart LLP and a member in good standing of the Bars of the States of Colorado and Nebraska, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Defendant, Frontier Airlines. There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,



Brian M. Mumaugh
Holland & Hart LLP
6380 South Fiddlers Green Circle, Suite 500
Greenwood Village, CO 80111
bmmumaugh@hollandhart.com
(303) 290-1067

Dated: October 7, 2014

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
RUTHBEY PEREZ,

Plaintiff,

-against-

FRONTIER AIRLINES,

Defendant.

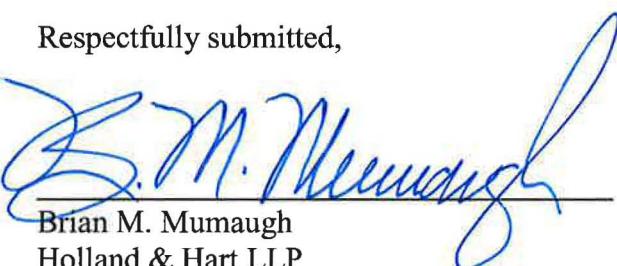
**MOTION TO ADMIT
COUNSEL PRO HAC VICE**
14 CV 5211 (BMC) (LB)

TO: Ruthbey Perez, Pro Se
41-46 50th Street, Apt. 2B
Woodside, NY 11377

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Bradford J. Williams, hereby move this Court for an Order for admission Pro Hac Vice as counsel for Frontier Airlines in the above-captioned action.

I am in good standing of the bars of the states of Colorado and Nebraska and there are no pending disciplinary proceedings against me in state or federal court.

Respectfully submitted,



Brian M. Mumaugh
Holland & Hart LLP
6380 South Fiddlers Green Circle, Suite 500
Greenwood Village, CO 80111
bmmumaugh@hollandhart.com
(303) 290-1067

Dated: October 7, 2014

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

RUTHBEY PEREZ,

Plaintiff,
-against-

**AFFIDAVIT OF BRIAN M. MUMAUGH
IN SUPPORT OF MOTION TO
ADMIT COUNSEL PRO HAC VICE**

14 CV 5211 (BMC) (LB)

FRONTIER AIRLINES,

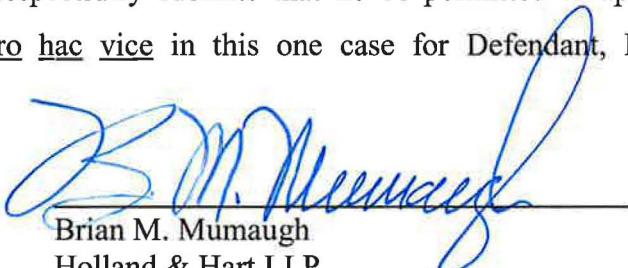
Defendant.

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State of Colorado)
) ss:
County of Denver)

Brian M. Mumaugh, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Holland & Hart LLP.
2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above captioned matter.
3. As shown in the Certificates of Good Standing annexed hereto I am a member in good standing of the Bars of the States of Colorado and Nebraska.
4. There are no pending disciplinary proceedings against me in any State or Federal court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this one case for Defendant, Frontier Airlines.



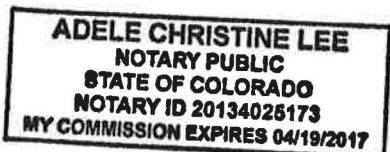
Brian M. Mumaugh
Holland & Hart LLP
6380 South Fiddlers Green Circle, Suite 500
Greenwood Village, CO 80111
bmmumaugh@hollandhart.com
(303) 290-1067

Dated: October 7, 2014

STATE OF COLORADO)
) ss.
COUNTY OF ARAPAHOE)

On this 7th day of October, 2014, before me personally appeared by Brian Mumaugh, to me known to be the person described in and who executed the foregoing instrument and acknowledged that Brian Mumaugh executed the same as his/her free act and deed.

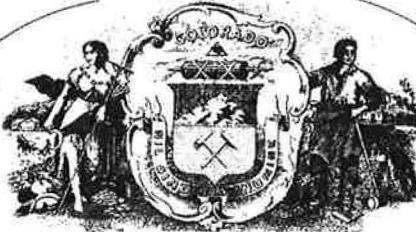
WITNESS my hand and seal the day and year last above written.


Notary Public

My Commission Expires: April 19, 2017

7162319_1

SUPREME COURT



State of Colorado

STATE OF COLORADO, ss:

I, Christopher T. Ryan Clerk of the Supreme Court of the State of Colorado, do hereby certify that

BRIAN M MUMAUGH

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 9th

day of November A. D. 1989 and that at the date hereof the said BRIAN M MUMAUGH

is in good standing at this Bar.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

25th day of September A. D. 2014

Christopher T. Ryan



By Carla Lufkin Clerk
Deputy Clerk

SUPREME COURT
STATE OF NEBRASKA
CERTIFICATE OF GOOD STANDING

I certify that I am Clerk of the Supreme Court of the State of Nebraska, the highest court of the State, and that on September 19, 1983, Brian M. Mumaugh was admitted to practice as an Attorney and Counselor at Law by the Supreme Court. I further certify that the attorney is now in good standing in the Courts of Nebraska, and there is not now pending in this court any disciplinary action. The attorney's private and professional character appears to be good.

IN TESTIMONY WHEREOF, I have hereunto set my hand and caused to be affixed the Seal of this Court, in the City of Lincoln, on September 26, 2014.



Terri A. Brown

Clerk

Jill Machacek
By *Jill Machacek* Acting Deputy Clerk

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

RUTHBEY PEREZ,

Plaintiff,

**ADMISSION TO PRACTICE
PRO HAC VICE**

-against-

FRONTIER AIRLINES,

14 CV 5211 (BMC) (LB)

Defendant.

-----X

The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney, Brian M. Mumaugh, is permitted to argue or try this particular case in whole or in part as counsel or advocate for Defendant, Frontier Airlines.

This Order becomes effective upon the Court's receipt of the required \$25.00 fee and confirms your appearance as counsel in this case. A notation of your admission pro hac vice in the above listed case will be made on the roll of attorneys.

Dated:

United States District Judge

cc: Pro Hac Vice Attorney
Court File

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

RUTHBEY PEREZ,

Plaintiff,

AFFIRMATION OF SERVICE

-against-

14 CV 5211 (BMC) (LB)

FRONTIER AIRLINES,

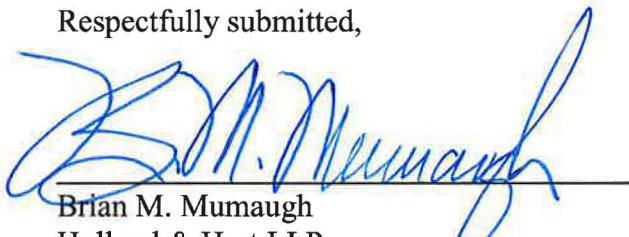
Defendant.

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I hereby certify that on this date, I caused a copy of the attached Notice of Motion to Admit Counsel Pro Hac Vice, Motion to Admit Counsel Pro Hac Vice, Affidavit of Brian M. Mumaugh in Support of Motion to Admit Counsel Pro Hac Vice, States of Colorado and Nebraska Certificates of Good Standing, and Admission to Practice Pro Hac Vice, upon Plaintiff Ruthbey Perez by mailing it, via U.S. Mail postage prepaid, to:

Ruthbey Perez
41-46 50th Street, Apt. 2B
Woodside, NY 11377

Respectfully submitted,



Brian M. Mumaugh
Holland & Hart LLP
6380 South Fiddlers Green Circle, Suite 500
Greenwood Village, CO 80111
bmmumaugh@hollandhart.com
(303) 290-1067

Dated: October 7, 2014